

IN THE UNITED STATE DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

Shelby County Democratic Party

PLAINTIFF

Marek for Memphis

Civil/ Action No.

VS

Gregg Grant Ind. - Greater Memphis Democratic Club

DEFENDANT

M LaTroy Alexandria-Williams Ind. - Shelby County Democratic Club

NOTICE OF REMOVAL

Pursuant to 28 U.S.C section 1446(a), Defendant M. LaTroy Alexandria-Williams (the "Defendant") , files this notice for the removal of this action from the Chancery Court of Shelby County , Tennessee for the Thirtieth judicial district at Memphis . The Defendant submits this notice in support of removal. Removal is based on jurisdiction conferred by 28U.S.C. Section 1332 because there is complete diversity among the parties and the amount in controversy is more than \$75,000.00, exclusive of interest and costs. The Defendant respectfully shows as follows:

- On or about September 26, 2019. Plaintiff, Shelby County Democratic Party, Marek for Memphis, file petition to seek permanent injunction declaratory relief. "Complaint) bearing Case No Ch-19-1370-3 in the Chancery Court of Shelby County, Tennessee for the Thirtieth Judicial District at Memphis(the "State Court Action") A true and correct copy of the Complaint and other pleadings from the State Court on is Action attached here to Exhibit " A".

The allegations in the complaint relate, 6000 Popular Ave Suite 150 Memphis Tennessee 38119(Attorney of the plaintiff. See Exhibit A, complaint at pp. 6-7 Prayer for Relief.

FACT

FEDERAL COURT OF TENNSEE

SHELBY COUNTY DEMOCRATIC

MAREK FOR MEMPHIS

PLAINTIFF

VS.

DEFENDANT

M.LATROY ALEXANDRIA WILLIAMS INDIVIDUALLY & D/B/A

NATIONAL DEMOCRATIC PARTY OF THE USA,INC.

SHELBY COUNTY DEMOCRATIC CLUB (SCDC), D/B/A

SHELBY COUNTY DEMOCRATIC PARTY, INC &

GREGG GRANT MEMPHIS DEMOCRATIC CLUB

MOTION FOR COUNTER LAW SUIT 666 MILLION & 50 CENT

**AND THE FAKE SHELBY COUNTY DEMOCRATIC PARTY RETURN BACK TO IT'S
ORIGINAL WHEN WE WERE LIDIGEMENT.**

**VIOLATION CIVIL RIGHTS ,VIOLATION OF VOTER RIGHT , BRIVRY , ABUSE OF
POWER OBSTRUCTION OF JUSTICE , INTERFERIG .**

**TO THE HONORABLE JUDGES OF THE FEDERAL COURT OF SHELBY COUNTY
TENNESSEE:**

We the Defendants, hereby pray that the Court Dismiss the above caption case based on the following facts: and prosecute every individual to the full extent and award M.LaTroy Alexandria and family a total of 666 million and 50 cent. Race judicata.

1. STANDING

It is the position of the Defendants that the Shelby County Democratic Marek for Memphis petitioner in the above case , and Congress Steve Cohen, individually, has no legal standing to bring forth this lawsuit under Tennessee Law. The premises of the petitioner lawsuit is that the Democratic National Committee, the Tennessee Democratic Party, and the Shelby County Democrats have a property right in both the name and the logo; and there is an inherent right for these recognized political organizations to be protected from predators seeking to mislead the public into thinking that actions taken by the Defendant Respondent are in fact the actions of these official organizations. It is our position that if this was true ad in fact their positions that one of all of these organizations should have filed said lawsuit and NOT The Fake Shelby County Democratic is a Fake Marek For Memphis.

1. MISREPRESENTATION TO THE COURT

It is the position of the defendants that John Marek fake Shelby County Democratic Party. Congress Steve Cohen, individually, has use the court for the Congressman's personal political gain. The Congressman Steve Cohen received and accepted the endorsements from the above , Defendants for the Congressman's re-election bid of 2012 (see attached Shelby County Democratic Club Ballot. The endorsement of Congressman Cohen included printed ballots two mass mail outs (early voting and election day), poll workers for both early voting and election day, radio ads. The Memphis Democratic Club also endorsed Congress Cohen in his re-election bid of 2010. The action brought by the John Marek Marek for Memphis and the Fake Shelby County Democratic Party in

the above caption is solely based on the fact that these organizations endorsed Attorney Rickey E. Wilkins in the 9th Congressional Race. These actions were bought by the fact that they endorse Willie Herenton, Joe Brown, M. LaTroy Williams, Myron Lawyer, John Marrett. However, we did endorse Myron Lawyer and John Marrett on some of the Democratic Ballots that is owned by the Shelby County Democratic Club and the National Democratic Club of the USA.

3.FIRST AMENDMENT OF THE CONSTITUTION

It is the position of the Defendants that the relief the petitioner is seeking is in total violation of the US Constitution-First Amendment Right to free speech. The above organizations are duly chartered by the State of Tennessee and have been recognized and accepted by the Shelby County Democratic Party as an affiliated club with the rights to appoint members of said clubs to serve on the Shelby County Democratic Party Committee (see attached organizations letter of appointments addressed to Chairman Bryan Carson) and the Shelby County Democratic Party 2013 Holiday Celebration Invitation showing all recognized Democratic Clubs including the Defendant organization. It is also the Defendants position that the Democratic Party of Tennessee and the Shelby County Democratic Party of Tennessee and the Shelby County Democratic Party has not deemed it Club names. Defendant Party did not print ballots for the 2011 City Election and the General Election for August 2012. Instead, the party yielded to the Shelby County Democratic Club for the printing and distribution of the "official Ballot" (See attached letter from SCDP Chairman Van Turner, Jr.)

WHEREFORE, PREMISES CONSIDERED, DEFENDANTS PRAY that:

Case # 10-1354-1

- 1. The court grant a full dismissal of the law suit September 9, 2010.**
- 2. That the Court lift the temporary restraining order against the defendants.**

- 3. That the Petitioner pay the defendants legal expenses relating to said case.**
- 4. Any and all general relief for the defendants that the court see necessary.**
- 5. Again that the Court granted full dismissal of the lawsuit file by Steve Cohen September 25,2014- CT 003348-14**
- 6. Again in January 27,2017.**

Channel 5, 100,0000-million, flyers (50,0000-million Dailey news \$10,00000 milliom , JACKSON BAKER 10,00000. MILLION, MARY MANCINI 25,00000-MILLION VAN TURNER 5,MILLION ALL MEMBERS VOTE AGAINST ME M. LATROY WILLIAMS BEING REMOVE FROM BALLOT IN 2018 . 2,00000-MILLION and all others surrogates TO PAY ONE MILLION EACH, AND DAVE CAMEBRON, 15,00000.MILLION.

and That All lawyers never practice law again in the State Of Tennessee.

All Political candidates who were a part of this scheme resign from there, position. And received no less than (10)ten yrs. and no more than 50 years in prison AND A FINE OF 5,00000-MILLION. All Corperation to pay 100 million each, Commercial Appeal to pay 150 million, Steve Cohen to pay 50 million JOHN MAREK 12,00000.MILLION. Total of 666 million dollars and 50 cent, plus jail time.

THEREFORE I PRAY THAT THIS ^{Conspiracy} CONSPIRACY AND SCHEME BE PUNISH TO THE FULLIST EXTENSE AND AWARD MLATROY WILLIAMS AND FAMILY A TOTAL NOT LESS THAN 666,00000.-MILLION 50 CENT


MY FAITHFUL REGARD,

MARION LATROY A-WILLIAMS SR.

3250 Commercial Parkway
Memphis TN. 38116

Bruce S. Kramer #7472

Apperson CRump; PLC
6000 Poplar Avenue suite 15
Memphis TN. 38119

Telephone: 901-756-6300
Facsimile: 901-757-1296

CONCLUSION

For the reasons described above, Defendant respectfully requests this Court take jurisdiction over this matter and proceed as if it had been originally filed herein.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document has been mailed by U.S. Mail, first class, postage prepaid, and emailed to the following: